

Jorgensen, Jay T.

Attachments: STOK 55491-55499 (2).pdf; 06-19-08 Index.pdf

From: Louis Bullock [mailto:lbullock@bullock-blakemore.com]

Sent: Thursday, June 19, 2008 3:50 PM

To: Bond, Michael R.

Cc: Kelly.Burch@oag.ok.gov; Baker, Fred; David Riggs; David Page; Daniel Lennington; Richard Garren; Bob Nance; Trevor Hammons; Xidis, Claire; Ward, Liza; Bob Blakemore; Nadine Hodge

Subject: Scenic River Commission Sampling Data.

Michael:

You will find attached as reflected on the accompanying index the most recent data collected by the Scenic Rivers Commission regarding its bacteria sampling in the IRW. In my view, this data is not covered by the Court's Order of January 5, 2007 (DKT. 1017). We are providing it to you in this expedited manner as an accommodation and will continue to do so. This is the sixth such report provided to Defendants and brings the production of these reports up to date. The previous five of these reports were listed on the accompanying index as Quality Assurance Laboratory Sample Analysis Report, which is the title on the report. I was informed today that Defendants in discussions with Plaintiff's counsel have requested these reports, suggesting that they might have missed the fact that they have already been produced. The first two of these reports were produced June 6, 2008 (STOK 54798-54806 and STOK 54807-54815); two were produced June 10, 2008 (STOK 54876-54884 and 54885-54893) and one was produced June 13, 2008 (STOK 55223-55231).

If you have any questions concerning this, please let me know.

Louis Bullock
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Thank you.

7/14/2008

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June 25, 2008

Michael Bond
Kutak Rock LLP
214 West Dickson St
The Three Sisters Building
Fayetteville, AR 72701-5221

(Via email and FedEx)

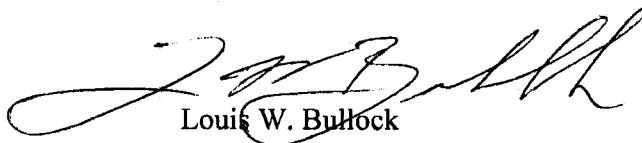
Re: *State of Oklahoma v. Tyson et al.*
No. 05-CV-0329-GKF-SAJ

Dear Michael:

Pursuant to the Court's order of January 5, 2007 (Dkt. 1016), and without waiving our objections, we are today FedExing to you STOK-CD79 and STOK-CD80, along with an inventory of the data being produced.

Should you have any questions concerning this production, please do not hesitate to call.

Sincerely,



Louis W. Bullock

Enclosures

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June 27, 2008

Michael Bond
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(Via email and FedEx)

Re: *State of Oklahoma v. Tyson et al.*, No. 05-CV-0329-GKF-SAJ

Dear Michael:

Pursuant to the Court's order of January 5, 2007 (Dkt. 1016), and without waiving our objections, we are today FedExing to you STOK-CD81, along with an index of documents being produced.

The production of this data is being expedited pursuant to the Defendants' request and the Court's Order (Dkt. 1710). It is important to understand that in order to expedite the production of this data, we have not been able to complete our internal QA/QC process on all of this data. As the review process is completed, we will supplement the production.

Included in this production is a draft of the Quality Assurance Project Plan for the sampling that has been undertaken by the Oklahoma Scenic Rivers Commission (OSRC). I believe this plan will soon be finalized and I will provide the finalized plan when it is complete. As I have stated before, while the production of the OSRC data and the attached Project Plan may be covered by other discovery from the Defendants, they are not subject to the Court's January 5, 2007 Order or the Court's Order which requires expedited production of the results of the analysis of data collected by the State's retained experts. These materials are being produced in this expedited fashion as an accommodation.

Should you have any questions concerning this production, please do not hesitate to call.

Sincerely,



Louis W. Bullock

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July 2, 2008

Michael Bond
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(Via email and FedEx)

Re: *State of Oklahoma v. Tyson et al.*, No. 05-CV-0329-GKF-SAJ

Dear Michael:

Pursuant to the Court's order of January 5, 2007 (Dkt. 1016), and without waiving our objections, we are today FedExing to you STOK-CD82, along with an index of documents being produced.

Included in this production are sample analysis reports for the sampling that has been undertaken by the Oklahoma Scenic Rivers Commission (OSRC). As I have stated before, while the production of the OSRC data may be covered by other discovery from the Defendants, it is not subject to the Court's January 5, 2007 Order or the Court's Order which requires expedited production of the results of the analysis of data collected by the State's retained experts. These materials are being produced in this expedited fashion as an accommodation.

Should you have any questions concerning this production, please do not hesitate to call.

Sincerely,



Louis W. Bullock

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July 10, 2008

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(Via email and FedEx)

Re: *State of Oklahoma v. Tyson et al.*, No. 05-CV-0329-GKF-SAJ

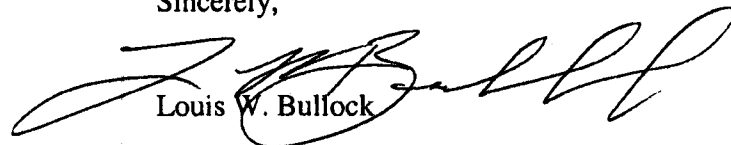
Dear Michael:

Pursuant to the Court's order of January 5, 2007 (Dkt. 1016), and without waiving our objections, we are today FedExing to you STOK-CD84, along with an index of documents being produced.

The production of the data from the A&L Lab is being expedited pursuant to the Defendants' request and the Court's Order (Dkt. 1710). It is important to understand that in order to expedite the production of this data, we have not been able to complete our internal QA/QC process this data. As we have done with this production of the data from EML that is contained in this production, as the review process is completed, we will supplement the production.

Should you have any questions concerning this production, please do not hesitate to call.

Sincerely,



Louis W. Bullock

